

## **Air Resources Board**



Alan C. Lloyd, Ph.D. Chairman

2020 L Street • P.O. Box 2815 • Sacramento, California 95812 • www.arb.ca.gov

December 10, 1999

Ms. Felicia Marcus
Regional Administrator
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Dear Ms. Marcus:

Enclosed are five copies of a draft revision to the California State Implementation Plan (SIP) -- the proposed 1999 Amendment to the 1997 Ozone SIP Revision for the South Coast Air Basin (1999 SIP Amendment). The proposed revision would amend the ozone portion of the South Coast Air Quality Management District's (SCAQMD's or District's) 1997 Air Quality Management Plan (AQMP). The District Board adopted the 1997 AQMP in November 1996; the Air Resources Board (ARB) approved it in January 1997 and submitted to the U.S. Environmental Protection Agency (U.S. EPA) as a SIP revision on February 5, 1997. U.S. EPA proposed to partially disapprove the 1997 submittal, citing deficiencies in the local control strategy. This amendment is intended to address those concerns and secure U.S. EPA's approval of the 1997 AQMP as amended to replace the local element of the applicable 1994 Ozone SIP.

We are requesting that you begin "parallel processing" of the proposed revision, as provided in Section 3.2.1 in Appendix V of Part 51, Code of Federal Regulations, pending adoption by the SCAQMD and ARB, and submittal as a SIP revision. The SCAQMD Board will consider the proposed 1999 SIP Amendment for adoption on December 10, 1999. If adopted by the District, ARB will consider approval of the amendment as a SIP revision on January 27-28, 2000. If ARB approves the revision, we will forward the final submittal to your office by February 4, 2000.

We believe the 1999 SIP Amendment would strengthen the District's element of the 1997 AQMP, accelerating near-term commitments and building on over 150 tons per day of new emission reductions adopted since the 1994 Ozone SIP. The District would commit to adopt and implement new measures to reduce ozone precursor emissions by over 80 tons per day by 2010, with over 55 percent from near-term measures. The District has also clearly stated its intention to pursue alternate measures in case the specific measures listed do not yield the full complement of emission reductions. Although my staff is still reviewing a few technical details in the proposed 1999 SIP Amendment, we expect to recommend that ARB approve the plan as a revision to the California SIP.

California Environmental Protection Agency

Felicia Marcus December 10, 1999 Page 2

The 1997 AQMP included an improved emissions inventory and a revised ozone attainment demonstration compared to the 1994 SIP, as well as an attainment demonstration for the federal particulate matter (PM10) standards. This proposed SIP revision would modify the local commitments in the 1994 SIP, changing the measures, the emission reductions, the schedule, and the rate-of-progress demonstration for ozone purposes, but would not amend the PM10 attainment demonstration. This revision would not modify the State and federal measures in the 1994 SIP, but would update the anticipated benefits of these measures based on the improved emissions inventory in the 1997 AQMP. The only formal revision we have submitted to the State element of the 1994 SIP is the withdrawal of measure M-7, Accelerated Retirement of Heavy-Duty Vehicles and replacement with new measure M-17, Additional Emission Reductions from Heavy-Duty Vehicles. U.S. EPA has not yet approved the M-7/M-17 SIP revision. This submittal would also update the emissions budgets for transportation conformity, consistent with the changes made as part of the M-7/M-17 package.

U.S. EPA approval of this SIP revision is important to ensure that the federally approved SIP continues to reflect updated emissions, modeling, and control strategies. As a practical matter, SIPs need to be revised and approved on a regular basis. This SIP revision is a necessary interim plan that should be implemented as the next comprehensive SIP is prepared.

We are working with the District to develop a comprehensive revision to the attainment demonstration for the federal one-hour ozone standard in the South Coast for submittal to U.S. EPA in 2001. We expect that the comprehensive revision will include the latest emissions estimates (using the EMFAC2000 model, the OFFROAD model, and an improved consumer products inventory), new modeling episodes developed from the Southern California Ozone Study, and a modified control strategy.

This submittal consists of the following materials:

- A. <u>Final 1999 Amendments to the 1997 Ozone State Implementation Plan</u> Revision for the South Coast Air Basin, with attachments.
  - 1. Appendix A, "Supporting Documentation on the Removal of 31 1994 Ozone SIP Control measures from the 1997 AQMP."
  - 2. Appendix B, "New and Revised Stationary Source Control Measures."

- B. Draft Supplemental Environmental Impact Report for the Proposed 1999
  Amendment to the 1997 Ozone State Implementation Plan (SIP) Revision for the South Coast Air Basin.
  - 1. Appendix A, "Summary of Information from the 1997 AQMP Final EIR."
  - 2. Appendix B, "Spreadsheets for Impacts Analysis."
  - 3. Appendix C, "Comment Letters and Responses to Comments."
- C. Notice of Completion of a Draft Supplemental Environmental Impact Report, (project title) 1999 Amendment to the 1997 Ozone State Implementation Plan (SIP) Revision for the South Coast Air Basin.

The SCAQMD will provide a complete set of the six attachments to Appendix A to Region IX directly, due to the volume of this material. Additional supporting documentation, including the completeness checklist, proofs of publication, public hearing notices, and SCAQMD and ARB resolutions, will be included in the final submittal.

If there are any questions regarding this submittal, please contact Ms. Cynthia Marvin, Chief, Air Quality and Transportation Planning Branch, at (916) 322-7236, or Ms. Sylvia Oey, District Liaison, at (916) 322-6110.

Sincerely,

//s//

Michael P. Kenny Executive Officer

Enclosures

cc: See next page.

Felicia Marcus December 10, 1999 Page 4

cc: Dr. Barry R. Wallerstein, Executive Officer (w/o Enclosures)
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, California 91765-4182

David Howekamp, Director (w/o Enclosures) Air Division U.S. Environmental Protection Agency Region IX 75 Hawthorne Street San Francisco, California 94105